

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

KATHLEEN SCHWEER, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

ZOOM HEALTH LLC

Defendant.

Case No. 5:25-cv-00454-JD

**DEFENDANT ZOOM HEALTH, LLC'S RESPONSE TO THE COURT'S ORDER TO
SHOW CAUSE AND ORDER SETTING HEARING**

COMES NOW, Gregg J. Lytle of the law firm of **Gordon Rees Scully Mansukhani** responds to the Court's Order to Show Cause and Order Setting Hearing as follows:

On June 9, 2025, the Court ordered Defendant Zoom Health, LLC to file a corporate disclosure statement meeting the requirements of Federal Rule of Civil Procedure 7.1 and Local Civil Rule 7.1.1 [Doc. No. 9]. On June 10, 2025, Zoom Health, LLC filed a corporate disclosure statement derived from the statement form found within the civil matters forms of the United States District Court for the Western District of Oklahoma's website. The Court ultimately struck this corporate disclosure submission on June 12, 2025.

Having submitted numerous corporate disclosure forms before, Defendant was under the impression that our June 10, 2025, submission may not have properly formatted in the correct PDF layout as this has been a reason for court filings to not be accepted before. In attempt to address this suspected issue, Defendant filed another corporate disclosure statement, with adjusted PDF formatting on June 16, 2025, to mend any errors regarding formatting of the document that may

have led to this non-acceptance by the Court. This second corporate disclosure statement submission was stricken by the Court. *See* [Doc. Nos. 11,12].

Following the denial of Defendant's second submitted corporate disclosure statement, Counsel for Defendant spoke with the Western District of Oklahoma Court Clerk's office to identify the issue with Defendant's corporate disclosure statement submissions as there was now profound confusion on our behalf. The representative at the Western District of Oklahoma Court Clerk's office could not identify the reason for denial of our previous corporate disclosure statement submissions. The representative suggested that there have previously been issues in prior cases within the Court pertaining to the corporate disclosure statement form found on the Western District of Oklahoma website being outdated. The representative recommended that we use the Eastern District of Oklahoma's corporate disclosure statement form and adjust the heading to match the Western District of Oklahoma in order to resolve this discrepancy.

On July 2, 2025, Defendant submitted this updated corporate disclosure statement based upon the Eastern District of Oklahoma's corporate disclosure form including additional information such as Defendant's entity location, in the hope that it would satisfy the court's inquiry of specifically identifying the Defendant. Counsel apologizes for the one-day delay in this submission of this disclosure statement having been ordered to submit this statement by June 1, 2025, however, there were difficulties submitting this statement on the evening of June 1, 2025, leading to submission on June 2, 2025.

Defendant contends that there have been severe misunderstandings of the Court's previous Orders leading to unintentional delay. It has never been Defendant's prerogative to delay the Court's proceedings in any fashion. This is the first time Defense Counsel has encountered such extensive issues submitting a corporate disclosure statement and asks for clear instruction on how

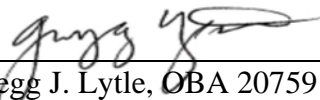
to promptly correct their submission to satisfy the Court. Defendant apologizes for delays on its part and respectfully requests a conference to identify specific corrections that must be made to their corporate disclosure form to achieve acceptance by the Court.

Respectfully Submitted,

GORDON REES SCULLY MANSUKHANI

Date: July 21, 2025

By:



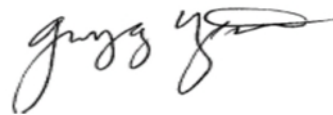
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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was served on the following counsel of record by the means indicated on July 23, 2025:

Via ECF Filing

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